

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
GOOGLE LLC'S ADMINISTRATIVE
MOTION TO SEAL RESPONSES AND
OBJECTIONS TO SPECIAL MASTER'S
REPORT AND ORDERS ON REFERRED
DISCOVERY ISSUES**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Defendant Google LLC's Administrative Motion to Seal portions of Google's Responses and Objections to Special Master's Report and Orders on Referred Discovery Issues (Dkt. 299) and supporting documents ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Party Claiming Confidentiality	Court's Ruling on Motion to Seal	Basis for Sealing Portion of Document
Google's Responses and Objections to Special Master's Report and Orders on Referred Discovery Issues	Google	GRANTED as to redacted portions at: 2:19-21; 3:2-7; 3:9; 3:13; 3:15; 4:8; 4:18-21; 5:3-4	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to various types of Google's internal identifiers, projects, data logs, and data structures related to its products and services, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 1	Google	GRANTED as to the entire document	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to various types of Google's internal identifiers, projects, data logs, and data structures related to its products and services, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 2	Google	GRANTED as to the entire document	Narrowly tailored to protect highly confidential and proprietary information

			regarding highly sensitive features of Google's internal systems and operations, including details related to Google's internal logs data and data usage policies, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 3	Google	GRANTED as to the entire document	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to Google's internal identifiers and data usage policies, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 4	Google	GRANTED as to the entire document	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to various types of Google's internal identifiers, data flow, and data structures related to its products and services, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

SO ORDERED.

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DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge